REMARKS

This Amendment, submitted in response to the Office Action dated September 2, 2008, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-18 are all the claims pending in the Application.

Objection to Specification

The Examiner objected to the specification. The Examiner states that there is no support for the term "computer-readable medium" as recited in claim 1. Applicant has amended the specification as indicated above. Therefore, Applicant requests that the objection to the specification be withdrawn.

Claim Rejections Under 35 U.S.C. § 101

The Examiner has rejected claims 1-8 under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter.

As indicated above, Applicant has amended the specification to clarify "computer-readable medium." Applicant submits that this should be sufficient to address the 35 U.S.C. § 101 rejection.

In the event further clarification is required with respect to the claim language, in order to expedite the prosecution for the present application, Applicant requests that the Examiner contact the Applicant's undersigned representative.

Claim Rejections Under 35 U.S.C. § 102

The Examiner has rejected claims 1-18 under 35 U.S.C. § 102(b) as allegedly being

anticipated by Coss et al. (US 6,170,012).

Claim 1

The Examiner asserts that Fig. 3, col. 2 and col. 4, lines 37-41 and 1-6 of Coss teach "a

first table storing sets of at least one primary rule, called 'primary metarules', in a

parameterizable form and in corresponding relationship to primary identifiers," as recited in

claim 1.

Fig. 3 of Coss discloses a table containing security policies.   The table provides for

categories including rule number, designations of source and destination hosts, designation of a

special service which can be called for in a packet, and a specification of an action to be taken on

a packet.

Claim 1 further recites:

> **management means** which is coupled to **control means** of
> said data processing server and, on receipt of **auxiliary
> data** representing operating parameters delivered by said
> **control means** after reception by the data processing server
> of secondary data, selects at least one of the **primary
> identifiers** in the first table and associates said
> auxiliary data therewith so as to define dedicated
> processes of said control means;

The Examiner asserts that col. 5, lines 35-46 of Coss teach this aspect of the claim. The

portion of Coss cited by the Examiner discloses stateful packet filtering. Coss discloses that the

results of rule processing are stored in a cache. Stateful packet filtering is implemented by

caching rule processing results for a received packet and then utilizing the cached results to

bypass the rule process for subsequent similar packets.

In order to ensure clarity in the record, Applicant requests that the Examiner particularly identify which aspect of the reference is being cited for teaching the claimed <u>management means</u> coupled to the <u>control means</u>.

Applicant submits there is no teaching or suggestion that a management means receives auxiliary data representing operating parameters delivered by said control means after reception by the data processing server of secondary data.

Specifically, there does not appear to be any teaching or suggestion of a data processing server receiving secondary data and subsequently, a management means receiving auxiliary data representing operating parameters delivered by a control means.

Coss merely discloses caching the results of applying a rule set to a packet so that when a subsequent packet from the same network session arrives in the firewall, the cached results from the previous packed are used.

Further, there is no teaching or suggestion that the management means selects at least one of the primary identifiers in the first table and associates the auxiliary data with the primary identifiers so as to define dedicated processes of the control means. Specifically, there is no teaching or suggestion that an identifier in the Table of Fig. 3 (first table as cited by the Examiner) is associated with auxiliary data so as to define dedicated processes of a control means.

Claim 1 further recites:

        wherein said at least one primary metarule is
specified according to <u>a string of characters</u> containing a
<u>place-holder for each parameter</u> of said primary metarule
that is not statically defined

The Examiner asserts that col. 4, lines 15-21 teaches this aspect of the claim. The
Examiner reasons that when a category provided for in the rule table is irrelevant in a certain
rule, the corresponding table entry can be marked as a 'wild card'. However, there is no teaching
or suggestion in Coss that a _primary metarule_ is specified according to a string of characters
containing a placeholder for each parameter that is not statically defined.

Specifically, if a wild card is placed in the table of Coss, it appears that the element
which the wild card is meant to replace, is _not_ a parameter of the a rule. Consequently, the "wild
card" entry is placed in the table when an entry is irrelevant. Therefore, Coss does not disclose
specifying a primary metarule according to a string of characters containing a placeholder for
each parameter that is not statically defined.

For at least the above reasons, claim 1 and its dependent claims should be deemed
allowable. To the extent claims 9, 15, 17 and 18 recite similar subject matter, claims 9, 15, 17
and 18 and their dependent claims should be deemed allowable for at least the same reasons.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed
to be in order, and such actions are hereby solicited. If any points remain in issue which the
Examiner feels may be best resolved through a personal or telephone interview, the Examiner is
kindly requested to contact the undersigned at the telephone number listed below.

This Amendment is being filed via the USPTO Electronic Filing System (EFS).
Applicant herewith petitions the Director of the USPTO to extend the time for reply to the
above-identified Office Action for an appropriate length of time if necessary. Any fee due under

AMENDMENT UNDER 37 C.F.R. § 1.111   Attorney Docket No.: Q83178
U.S. Appln. No.: 10/511,898

37 U.S.C. § 1.17(a) is being paid via the USPTO Electronic Filing System (EFS). The USPTO is

also directed and authorized to charge all required fees, except for the Issue Fee and the

Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said

Deposit Account.

                                          Respectfully submitted,

                                          /Ruthleen E. Uy/

SUGHRUE MION, PLLC   Ruthleen E. Uy
Telephone: (202) 293-7060   Registration No. 51,361
Facsimile: (202) 293-7860
    WASHINGTON OFFICE
    23373
    CUSTOMER NUMBER

Date: December 2, 2008